

1 **NEXUS BANKRUPTCY**  
2 BENJAMIN HESTON (297798)  
3 100 Bayview Circle #100  
4 Newport Beach, CA 92660  
5 Tel: 951.290.2827  
6 Fax: 949.288.2054  
7 *ben@nexusbk.com*

8 Attorneys for Debtor

9 **UNITED STATES BANKRUPTCY COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 **LOS ANGELES DIVISION**

12 In re:  
13 ROBERT DANIEL GHUIZELIAN,  
14 Debtor.

15 Case No.: 2:22-bk-10162-VZ

16 Chapter 13

17 **OPPOSITION TRUSTEE'S MOTION TO  
18 DISMISS CHAPTER 13 PROCEEDING**

19 Hearing  
20 Date: May 8, 2023  
21 Time: 11:30 a.m.  
22 Courtroom 1368

23 TO NANCY CURRY, CHAPTER 13 TRUSTEE, AND ALL INTERESTED PARTIES:

24 Debtor, Robert Daniel Ghuizelian, hereby opposes the Trustee's Motion for Order  
25 Dismissing Chapter 13 Proceeding on the grounds that he will cure the payment delinquency  
26 prior to the hearing on this Motion and he will move to modify his plan.

27 Parties are hereby notified that a hearing on the Trustee's Motion for Order Dismissing  
28 Chapter 13 Proceeding has been set for May 8, 2023, at 11:30 a.m. in Courtroom 1368 of the  
29 United States Bankruptcy Court – Los Angeles Division, located at 255 E. Temple Street, Suite  
30 1360, Los Angeles, CA 90012.

31 Date: March 22, 2023

32 **NEXUS BANKRUPTCY**

33   
34 BENJAMIN HESTON,  
35 Attorney for Debtor

## **PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**100 Bayview Circle, Suite 100  
Newport Beach, CA 92660**

A true and correct copy of the foregoing document entitled (*specify*): **OPPOSITION TO TRUSTEE'S MOTION TO DISMISS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 3/22/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Nancy K Curry (TR) TrusteeECFMail@gmail.com  
United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov  
Diane Weifenbach diane@attylsi.com, bankruptcy1@attylsi.com

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 3/22/2023 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Judge Vincent P. Zurzolo  
255 E. Temple Street  
Suite 1360 / Courtroom 1368  
Los Angeles, CA 90012

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed (state method for each person or entity served):

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

**3/22/2023**  
*Date*

**Benjamin Heston**  
*Printed Name*

**/s/Benjamin Heston**  
\_\_\_\_\_  
**Signature**

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.